

Before the
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Size Limits for International Packets

Docket No. MC2021-25

PUBLIC REPRESENTATIVE COMMENTS
(November 20, 2020)

Pursuant to 39 CFR § 3040.212, the Postal Service filed a notice on November 5, 2020, announcing minor changes in classification governing International Mail in the Mail Classification Schedule (MCS).¹ On November 6, 2020, the Commission established this docket to consider matters raised by the Notice and appointed the undersigned to serve as Public Representative.²

The changes presented in the Notice revise size limits for international small packets that appear in six sections of the MCS.³ The Postal Service states that these changes are similar to changes to other products that were included in its initial filing in Docket No. CP2021-15 and were made to conform to international standards limiting the minimum length and height to 6 inches and 4 inches respectively. Notice at 1-2. The Postal Service proposes January 24, 2021, as the effective date of these changes to coincide with the implementation of the competitive published price change filed in Docket No. CP2021-15.⁴

Section 3040.212 of the Commission's regulations provides that "[t]he Postal Service shall notify the Commission of updates to size and weight limitations for competitive mail

¹ Notice of the United States Postal Service of Minor Classification Changes Concerning the Minimum Size Limit for International Small Packet, November 5, 2020 (Notice). Attachment 1 to the Notice shows conforming changes to the MCS.

² Notice and Order Concerning Minor Changes to Product Description, November 6, 2020, at 3 (Order No. 5750).

³ Those six MCS sections are: section 2340.2 Inbound Letter Post Small Packets and Bulky Letters; section 2510.3.2 Global Expedited Package Services (GEPS) Contracts; section 2510.5.2 Global Bulk Economy (GBE) Contracts; section 2510.6.2 Global Plus Contracts, section 2510.7.2 Global Reseller Expedited Package Contracts; and section 2510.8.2 Global Expedited Package Services (GEPS)-Non-Published Rates. Notice at 1.

⁴ See Docket No. CP2021-15, United States Postal Service Notice of Changes in Rates of General Applicability for Competitive International Products, October 9, 2020.

matter pursuant to subpart E of this part [3040].” 39 CFR § 3040.212. The Postal Service states that its “notice satisfies the requirements of subpart E of part 3040.” Notice at 2.

The Postal Service asserts that the changes presented in the Notice will more accurately represent current product offerings as provided in 39 CFR § 3040.190(a); are presented at least 15 days prior to the intended effective date as required by 39 CFR § 3040.190(b); and merely revise size limitations without otherwise changing product offerings or prices or price groups in accordance with 39 CFR § 3040.190(c). Notice at 2-3. The Postal Service concludes by asserting that the changes to the MCS are minor classification changes to the affected product descriptions. *Id.* at 3.

The Public Representative has reviewed the Notice, proposed classification changes, and applicable statutory and regulatory provisions. The Public Representative concludes that the proposed MCS changes are minor classification changes that comply with 39 CFR part 3040, subpart E.

Respectfully submitted,

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